

**Fill in this information to identify the case:**

Debtor 1 Mark Alan Shaffer  
Debtor 2 Christine Anne Shaffer  
(Spouse, if filing)  
United States Bankruptcy Court for the: WESTERN District of Pennsylvania  
(State)  
Case Number 14-23636 CMB

## Form 4100R

### Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

#### Part 1: Mortgage Information

Name of creditor: Ally Bank Court Claim No. (if known):  
7

Last 4 digits of any number you use to identify the debtor's account: 3201

Property Address 444 Cole Road  
Number  Street   
  
Sarver, PA 16055  
City  State  ZIP Code

#### Part 2: Prepetition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \_\_\_\_\_

#### Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

November 1, 2019 \*\*loan is contractually due for

The next postpetition payment from the debtor(s) is due on: February 1, 2020

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$0.00

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$0.00

c. **Total.** Add lines a and b.

(c) \$0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor 1	Mark Alan Shaffer	Case number (if known)	14-23636 CMB
	First name      Middle Name      Last name		

#### **Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

#### **Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim**

*Check the appropriate box:*

I am the creditor.  
 I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/ Jodi L. Hause, Esquire  
 Signature

Date November 11, 2019

Print Jodi L. Hause, Esq., Id. No.90625 Title Attorney for Plaintiff  
 First Name      Middle Name      Last Name

Company Phelan Hallinan Diamond & Jones, LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 1617 JFK Boulevard, Suite 1400, One Penn Center Plaza  
 Number      Street

Philadelphia, PA 19103  
 City      State      ZIP Code

Contact Phone 215-563-7000 Email Jodi.Hause@phelanhallinan.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>Mark Alan Shaffer</b>	:	<b>BK. No. 14-23636 CMB</b>
<b>Christine Anne Shaffer</b>	:	
	<b>Debtors</b>	<b>Chapter No. 13</b>
	:	
<b>Ronda J. Winnecour</b>	:	
	<b>Movant</b>	:
		:
<b>v.</b>	:	
<b>Ally Bank</b>	:	
	<b>Respondent</b>	:
		:
		:

**CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I certify under penalty of perjury that I served or caused to be served the above captioned Response to Notice of Final Cure Payment on the parties at the addresses shown below or on the attached list on November 11, 2019.

The types of service made on the parties were: Electronic Notification and First Class Mail.

Service by Electronic Notification

Service by First Class Mail

Ronda J. Winnecour, Esquire (TRUSTEE)  
Suite 3250, Usx Tower, 600 Grant Street  
Pittsburgh, PA 15219

Mark Shaffer  
547 West Main Street  
Saxonburg, PA 16056

SCOTT B. LANG, Esquire  
535 CLAIRTON BOULEVARD  
PITTSBURGH, PA 15236

Christine Shaffer  
547 West Main Street  
Saxonburg, PA 16056

Office Of The United States Trustee  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222

Ronda J. Winnecour, Esquire  
(TRUSTEE)  
Suite 3250, Usx Tower, 600 Grant  
Street  
Pittsburgh, PA 15219

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification" and those served by mail will be listed under the heading: Service by First Class Mail."

/s/ Jodi L. Hause, Esquire  
Jodi L. Hause, Esq., Id. No.90625  
Phelan Hallinan Diamond & Jones, LLP  
Omni William Penn Office Tower  
555 Grant Street, Suite 300  
Pittsburgh, PA 15219  
Phone Number: 215-563-7000 Ext 31502  
Fax Number: 215-568-7616  
Email: Jodi.Hause@phelanhallinan.com

November 11, 2019

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